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August 31, 2023

Honorable J. Paul Oetken
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: USA v Kukushkin, 19 Cr. 725 (JPO)

Dear Judge Oetken:

I respectfully submit this letter to request that the Court order the return of Andrey Kukushkin's passports. Mr. Kukushkin holds both U.S. and Ukrainian passports. Mr. Kukushkin was ordered to surrender his passports as a condition of his release on bail before and during trial. Now that Mr. Kukushkin has finished serving his sentence and his bail has been exonerated, Mr. Kukushkin seeks to have his passports returned to him. Pretrial Services is currently in possession of the passports, and Pretrial Services Officer Kathia Bermudez advised me that a court order is required to release them either to Mr. Kukushkin or to me.

Accordingly, I respectfully request, on Mr. Kukushkin's behalf, that the Court "so order" this letter, allowing Mr. Kukushkin's passports to be released either to Mr. Kukushkin or to me, so that I can provide them to him. I have exchanged emails with AUSA Aline Flodr about this request, and the Government does not object to the return of Mr. Kukushkin's passports.

Thank you for your consideration of this request.

Respectfully submitted,



Celeste L.M. Koeleveld

cc: AUSA Aline R. Flodr